

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA
HARRISBURG DIVISION

IN RE:

MALACHI AND GRACE KAHLER

Debtor(s)

SANTANDER CONSUMER USA INC
Movant

v.

MALACHI AND GRACE KAHLER
Respondent(s)

CHARLES J. DEHART, III
Trustee

Case No.: 1:15-05239
Chapter 13

OBJECTION TO MOTION FOR RELIEF FROM STAY

TO THE HONORABLE JUDGES OF THE U.S. BANKRUPTCY COURT:

Debtors, through their attorney, Sean P. Quinlan, Esquire, hereby represents as follows:

1. On or about December 7, 2015, the debtors filed a Chapter 13 Petition with this Court.
2. Listed in the debtor's schedules and plan is a 2008 Dodge Charger which vehicle is subject to a vehicle lien held by Santander Consumer USA INC
3. On September 14, 2016 Santander Consumer USA Inc filed a Motion for Relief from Stay stating that the above debtors were deficient with post-petition vehicle payments in the amount of \$2087.31.
4. Counsel spoke with the debtors regarding the Motion and they have had some unfortunate health issues which have prevented them from maintaining the monthly vehicle payments to Santander and will be amending their plan to include this amount to be paid through the plan. The Debtors will continue to make post-petition Vehicle payments to Santander beginning with October, 2016 payment as their income and budget have now stabilized.

5. For the above stated reason, the debtors through Counsel, requests that the Motion for Relief from Stay filed by Santander Consumer USA Inc Attorney, William E. Craig, be denied as the debtors will be proposing a feasible Amended plan with the total of post-petition payments listed in plan to be paid by Chapter 13 Trustee.

WHEREFORE, Debtors, through undersigned, requests that this Honorable Court deny the Motion for Relief from Stay filed by Santander Consumer USA Inc through Counsel William E. Craig and allow the debtors the ability to cure the post-petition deficiency through the Chapter 13 plan.

Dated: 9/29/2016

/s/ Sean P. Quinlan, Esquire
Sean P. Quinlan, Attorney for Debtors